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Attorneys for Plaintiff Bridgett Dahl

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRIDGETT DAHL, an individual,

Plaintiff,

v.

JACOB MANDRUSIAK a/k/a JAKE
MANDRUSIAK, an individual; DOES 1-10,
unknown individuals; and ROE COMPANIES
1-10, unknown business entities,

Defendants.

Case No.: 2:18-cv-02225-APG-DJA

**STIPULATION AND ORDER TO
CONTINUE THE JURY TRIAL DATE**

(First Request)

Plaintiff Bridgett Dahl ("Plaintiff") and Defendant Jacob Mandrusiak ("Defendant")
(together, the "Parties"), by and through their respective counsel of record, hereby stipulate and
agree to the following:

1. On September 2, 2020, the Court granted the Parties' Joint Pretrial Order [ECF
76] and set this case for jury trial on a stacked calendar on February 8, 2021 at 9:00 a.m. in
Courtroom 6C. Calendar Call is set for February 2, 2021 at 8:45 a.m. in Courtroom 6C.

2. Due to the current events concerning COVID-19, the Court entered Third
Amended Temporary General Order 2020-03 on November 12, 2020, stating that all jury trials
will be postponed until further notice, and the presiding judges will address the need for any trial

1 continuance in their individual cases. In light of this order, the Parties have not sought or
 2 received commitments from their retained experts to appear for the current trial date.

3 3. Additionally, Defendant is a Canadian citizen and the border between the United
 4 States and Canada remains closed concerning COVID-19. As such, Defendant would likely be
 5 unable to attend trial in person even if it were to move forward on the scheduled date.

6 4. Additionally, Plaintiff recently gave birth to a baby on December 29, 2020, and is
 7 dealing with issues related to being a new mother.

8 5. Accordingly, the Parties have agreed to continue the jury trial in this matter by
 9 three (3) months and jointly offer these three new trial dates: May 10, 2021, May 17, 2021, and
 10 May 24, 2021.

11 6. The Parties estimate that the jury trial in this matter will take a total of 5-10 days.

12 7. It is expressly understood by the undersigned that the Court will set the jury trial
 13 in this matter on one of the agreed-upon dates if possible; if not, the trial will be set at the
 14 convenience of the Court's calendar.

15 8. The Parties additionally request that the current Calendar Call in this matter,
 16 currently scheduled for February 2, 2021 at 8:45 a.m., be rescheduled in accordance with the
 17 continued trial date.

18 Dated this 6th day of January, 2021.

Dated this 6th day of January, 2021.

19 SEMENZA KIRCHER RICKARD

WILSON ELSEER MOSKOWITZ EDELMAN
 & DICKER LLP

21 /s/ Jarrod L. Rickard

/s/ Michael P. Lowry

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IT IS SO ORDERED:

This case is set for jury trial on the stacked calendar on May 17, 2021 in Courtroom 6C. Calendar Call will be held on May 11, 2021 at 8:45 a.m. in Courtroom 6C.



UNITED STATES DISTRICT JUDGE

DATED: January 6, 2021

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